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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JOSEPH ZIEGLER,

Plaintiff,

-VS-

CLAY CO SHERIFF et al,  
MILES SLACK,  
M.P. MORRIS,  
DEPUTY THOMAS,  
C.C. GROSE,  
JIM SAMPLES,  
FRAN KING,

Defendants,

Case:2:19-cv-11105  
Judge: Michelson, Laurie J.  
MJ: Whalen, R. Steven  
Filed: 04-16-2019 At 02:41 PM  
CMP ZIEGLER v CLAY CO SHERIFF, ET A  
L (dat)

**COMPLAINT FOR CIVIL ACTION**

NOW COMES, JOSEPH ZIEGLER, Plaintiff presently filing in Pro Per, and Forma Pauperis that is a FREE U.S. Citizen(and NOT a "Prisoner", per 28 USC 1915 et seq), Who hereby moves this Honorable U.S. District Court For Eastern District of Michigan Southern Division, pursuant to 42 U.S.C. 1983 through 42 USC 1986 et seq; Federal Civil RICO, 18 USC 1961-1968; Federal Anti-Kickback Act, 41 USC 51 et seq; and/or any/all other Federal Statutes on violations of clearly established Federal Civil Rights and Federal Laws as determined by the U.S. Supreme Court under the Federal Doctrine of Laches, and/or Law-of-the Case Doctrine by filing this herein Plaintiff's Complaint For Civil Action, based upon any/all of the following:

**PARTIES PRESENTED**

(1) That Plaintiff JOSEPH ZIEGLER is a Free U.S. Citizen(and NOT a Prisoner, 28 USC 1915 et seq) that is Indigent(ie, Application To Proceed In Forma Pauperis) that resides at 59 Pingree, Pontiac,

Michigan 48342. Who possesses the capacity to sue the Defendants for blatantly violating and/or conspiring to violate this Pro Se Plaintiff's clearly established Federal Civil Rights, Federal Statutes/Laws, and their U.S. Constitutional Rights protected under Equal Protection of Law as setforth in the herein Federal Claims For Action as determined by the U.S. Supreme Court.

(2) That the Defendant(s) CLAY CO SHERIFF et al; MILES SLACK; M.P. MORRIS; DEPUTY THOMAS; and C.C. GROSE, at 225 Main Street, Clay, WV 25043. Who possesses the capacity to be sued for acting under/outside the color of State Law in their official-capacity, and personal-capacity for blatantly acting outside the color of law and their Governmental Function by violating and/or conspiring with Co-Defendants et al to violate this Plaintiff's clearly established Federal Civil Rights, Federal Laws, and Plaintiff(s) clearly established Federal Constitutional Rights as setforth in the herein Federal Claims For Action as determined by the U.S. Supreme Court.

(3) That the Defendant(s) JIM SAMPLES et al, at 246 Main Street, Clay, WV 25043. Who possesses the capacity to be sued for acting under/outside the color of State Law in their official-capacity, and personal-capacity for blatantly acting outside the color of law and their Governmental Function by violating and/or conspiring with Co-Defendants et al to violate this Plaintiff's clearly established Federal Civil Rights, Federal Laws, and Plaintiff(s) clearly established Federal Constitutional Rights as setforth in the herein Federal Claims For Action as determined by the U.S. Supreme Court.

(4) That the Defendant(s) FRAN KING, at 220 Prociuous Maysel Rd., Clay, WV 25043. Who possesses the capacity to be sued for acting under/outside the color of State Law in her official-capacity, and personal-capacity for blatantly acting outside the color of law and their Governmental Function by violating and/or conspiring with Co-Defendants et al to violate this Plaintiff's clearly

established Federal Civil Rights, Federal Laws, and Plaintiff(s) clearly established Federal Constitutional Rights as set forth in the herein Federal Claims For Action as determined by the U.S. Supreme Court.

**JURISDICTION**

(5) That this Plaintiff states that he resides within this Honorable United States District Court For The Eastern District of Michigan Southern Division's Jurisdiction, and that Defendant(s) et al violated and/or conspired to violate this Plaintiff of his clearly established Federal Civil Rights, Federal Law and Federal Constitutional Rights within this Honorable United States District Court For The Eastern District of Michigan Southern Division's Jurisdiction. See 28 USC 1343.

**FIRST FEDERAL CLAIM FOR ACTION**

(6) On **APRIL 2, 2019**, This Disabled Minority Plaintiff and Journalist traveled to Clay Co, West Virginia as a Freelance Journalist for accredited mainstream media Reader Supported News Agency-Godot; National Association of Professional Organizers(NAPO) to Stop Police Brutality and Judicial Corruption; and Federal Informant regarding the ongoing Federal Investigation concerning the Ambush and Execution of Corrupt Police Officers in Clay County West Virginia involved with the remaining Police Officers and Public Officials in Clay County being involved with the continual unlawful and illegal distribution of Methamphetamine, Opioid and Heroin Distribution in Clay Co, West Virginia that was obtained from Family Members currently serving in Afghanistan guarding Heroin Field(and for U.S. Pharmaceutical Companies according to the Pentagon)

(7) On **APRIL 3, 2019**, This Disabled Minority Plaintiff and Journalist was engaging in exercising his clearly established Equal Protection Right/Privilege to Freedom of the Press, and Association was unlawfully threatened by Defendants for interviewing local residents concerning all the Defendants that are currently involved in unlawful and illegal distribution of Methamphetamine and Heroin

Distribution in Clay Co, West Virginia that only has 4 Police Officers(eg, MILES SLACK; M.P. MORRIS; DEPUTY THOMAS; and C.C. GROSE); and One Shift from 0800 hours to 1600 hours. Because the Local Residents voted not to fund the Clay Co Sheriff Dept Police Officers due to ongoing Federal Investigation on corrupt police officers criminal activities and systematically extorting, threatening, and unsolved murders of citizens that are trying to get rid of corrupt Police Officers, Elected Officials and Judges in Local Court System.

(8) On APRIL 4,2019, This Disabled Minority Plaintiff and Journalist was engaging in exercising his clearly established Equal Protection Right/Privilege to Freedom of the Press, Association, Freedom of Movement, and Travel was unlawfully charged by the Defendant(s) MILES SLACK; M.P. MORRIS; DEPUTY THOMAS; C.C. GROSE; and JIM SAMPLES while acting under color of law and Defendant(s) MILES SLACK's failure to adequately train subordinate Co-Defendants concerning the unlawful towing/seizure/forefeiture of this Plaintiff's undriveable motor vehicle(property) with two flat tires.(ie, 2018 Ford Escape with current Michigan License Plates and Full Coverage Insurance). That this Plaintiff lawfully inherited by Court-Order from a Oakland Co Probate Court Judge in Pontiac, Michigan. That was lawfully parked on private property at a friends house in Clay West Virginia, and was unlawfully towed/seized by said Defendants et al to deprive this Plaintiff of his Property without Due Process of Law, in violation of his Federal Equal Protection Right not to be Discriminated against based upon his Race, Disability, National Origin for being engaged in a Federally protected Right/Privilege to Freedom of the Press, Association, and clearly established Right not to be deprived of Property without Due Process of Law. That resulted in the Defendants et al violating and/or conspiring to violate this Plaintiff's clearly established Federal Civil Rights to Equal Protection of Law as determined by the U.S. Supreme Court.

**SECOND FEDERAL CLAIM FOR ACTION**

(9) On **APRIL 5, 2019**, This Disabled Minority Pro Se Plaintiff and Journalist personally met with Defendants JIM SAMPLES, M.P. MORRIS, AND FRAN KING regarding the unlawful towing/seizure of this Plaintiff's lawfully inherited property(ie, undriveable 2018 Ford Escape with two front flat tires from friends private property), and when this Plaintiff questioned said Defendants regarding the unlawful towing contract issued to Defendant FRAN KING in violation of the Federal Anti-Kickback Act to secure contract with said Co-Defendants to allow said Defendants to financially be compensated for said County Towing Contract(a felony), and complaint that this Plaintiff was being deprived of his Property without Due Process of Law by the Defendants, in violation of his Federal Equal Protection Right not to be deprived of Property without Due Process of Law.

(10) This Plaintiff claims that the Defendants JIM SAMPLES, M.P. MORRIS, AND FRAN KING et al verbally threatened to arrest and physically assault this Plaintiff, including the Defendants not sending this Plaintiff any letters or notices in the mail of any/all courtdates for this Plaintiff to appear in court. If this Plaintiff files anything in State of Federal Courts against the Defendants for violating and/or conspiring to violate this Plaintiff's clearly established Federal Civil Rights to Equal Protection of Law as determined by the U.S. Supreme Court.

**THIRD FEDERAL CLAIM FOR ACTION**

(11) That this Plaintiff states as his claim upon which relief should be granted is based upon the fact. That Plaintiff hereby demands/requests that this Honorable U.S. District Court Judge to issue an immediate Order For Preliminary Injunction. Because there is a strong likelihood that this Plaintiff will prevail on the merits and any reasonable juror would rule in Plaintiff's favor. That Plaintiff stated a claim upon which relief should be granted; That Plaintiff will suffer a actual "irreparable harm/injury"

by the Defendants et al under the Federal Doctrine of Laches. If this Honorable Federal Court does not issue a Preliminary Injunction and Order For Replevin to preserve the Status Quo of Person/Property; Prohibit the Defendants from committing imminent acts of Retaliation for this Plaintiff being engaged in the Federally protected Right to Seek Civil Redress of his Grievances under Equal Protection of the Law/ Thus, This Honorable Federal Court Judge should balance the harms between the Parties; and that the Public Interest will be directly/indirectly effected by issuing a Order For Preliminary Injunction and/or Order For Replevin as mandated under Federal Law as determined by the US Supreme Court.

**DEMAND FOR JURY TRIAL**

(12) That this Plaintiff states that he has stated a claim upon which relief should be granted against any/all of the Plaintiff's herein Federal Claims For Action, and that a reasonable Juror would rule/decide in Plaintiff's favor that Defendant(s) et al while acting under and outside the color of law blatantly violated Plaintiff's clearly established Federal Civil Rights, Federal Constitutional Rights and hereby demands a Jury Trial by Right. FRCVP Rule 38.

**RIGHT TO AMEND**

(13) That this Plaintiff reserves the Right to Amend this Pro Se Federal Complaint For Civil Action as may be required under FRCP, Federal Statute, and in the Interest of Justice. FRCP Rule 15. As well as introduce "Similar Acts" of recent Routine Practice of Federal Civil Rights violations committed by the Defendants et al in violation of clearly established Federal Law to warrant a Federal Civil Rights Investigation by the U.S. Department of Justice and prosecuting the herein Civil Rights Complaint.

WHEREFORE, This Plaintiff demands that this Honorable United States Eastern District Court of Michigan Southern Division honors this Plaintiff's Federal Complaint For Civil Action, pursuant to 42 U.S.C. 1983 et seq through 42 USC 1986 et seq; 18 USC 1961-1968; 41 USC 51 et seq; and/or any/all other applicable Federal Statutes. Since this Plaintiff has stated a claim upon which relief should/can be granted, and that there is a reasonable probability that a reasonable Jury would rule in Plaintiff's favor that the Defendants et al violated, and/or conspired to violate this Plaintiff's clearly established Federal Constitutional Right to Equal Protection of Law, Due Process of Law, Right to Property, Freedom of the Press, Freedom of Movement, Travel, Association, Commerce, Privileges, and the Immunities and Comity Clause protected under the 1<sup>st</sup>, 4<sup>th</sup>, 14<sup>th</sup> Amendments of the U.S. Constitution as determined by the United States Supreme Court under the Federal Doctrine of Laches and Federal Law-of-the Case Doctrine.

Further, This Plaintiff seeks/demands any/all of the following:

(A) That this Honorable U.S. District Court Judge issue both Declaratory and Injunctive Relief to this Plaintiff on any/all Claims For Action asserted by this Plaintiff against the Defendants et al acting within/outside their Official-Capacities and that are found to be following Federal/State Law as their Governmental Function; Defendants Policy/Procedure; and for violating this Plaintiff's clearly established Federal Civil Rights, Federal Constitutional Rights and Federal Laws;

(B) That this Honorable U.S. District Court Judge issue both Declaratory, Injunctive, and Writ of Replevin Relief to this Plaintiff on any/all Claims For Action asserted by this Plaintiff against Defendants et al for acting within/outside their Official-Capacities, and Order the Defendants et al to cease/desist from committing any further acts of Discrimination, Retaliation, Harassment, Intimidation, False Charges, Physical Assault, and any further Unlawful Restraint/Seizure/Forefeiture of

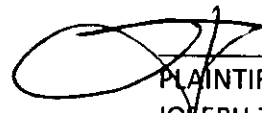
Plaintiff's Property(ie, Undriveable 2018 Ford Escape with two flat tires in Defendant Fran King's possession without consent/right) for being engaged in exercising this Plaintiff's clearly established Federal Civil Rights, and/or Federal Constitutional Rights to Seek Redress from the Government under Equal Protection Due Process of Law and Access to the Courts by filing this Federal Civil Action Complaint. That this Plaintiff inherited per Court-Order by the Oakland County Probate Court;

(C) That this Honorable U.S. District Court Judge to issue ORDER for Jury Trial for the herein Plaintiff, in order to be compensated for actual, compensatory, treble, and/or punitive damages from the Defendants et al in the sum of \$1,000,000(ie, One Million Dollars) on any/all herein Federal Claims For Action asserted by this Pro Se Plaintiff against any/all Defendant(s) et al found to be acting inside/outside of their Official-Capacities, and/or in their Individual-Capacities from personal assets for violating Plaintiff's clearly established Federal Civil Rights protected under Federal Law for blatantly violating and/or conspiring to violate this Plaintiff's clearly established Federal Constitutional to Rights to Equal Protection of Law, Due Process of Law, Right to Property, Freedom of the Press, Freedom of Movement, Travel, Association, Commerce, Privileges, and the Immunities and Comity Clause protected under of Article 1, Section 8, Clause 3; Article 6, Section 2, Clause 1; and the 1<sup>st</sup>, 4<sup>th</sup>, 14<sup>th</sup> Amendments of the U.S. Constitution as determined by the United States Supreme Court under the Federal Doctrine of Laches and Federal Law-of-the Case Doctrine, as all circumstances should dictate and Justice would so demand.

Date: 4/13/19

XC: Defendants  
File

Respectfully Submitted,

  
PLAINTIFF IN PRO PER  
JOSEPH ZIEGLER  
59 PINGREE  
PONTIAC, MICH 48342



ZIEGLER  
JINGREE  
ITLAC, MICH 48342

*Handwritten:* MCH 48342

**RECEIVED**  
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